

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Carpenters Fringe Benefit Funds of)	
Illinois, et al.)	
Plaintiff,)	
v.)	No. 08 CV 3346
)	
Longshore/Daly, Inc., an Illinois)	
corporation,)	
Defendant.)	

Motion to Extend Time to Respond

NOW COMES Longshore/Daly, Inc. through its attorneys, Anderson & Moore, P.C., and respectfully requests the entry of an order extending the time to file its answer and in support thereof states:

1. Longshore/Daly, Inc. is an Illinois corporation whose registered agent is the undersigned attorney.
2. Summons was served upon Thomas S. Moore as registered agent for Longshore/Daly, Inc. on June 13, 2008.
3. Longshore/Daly's answer is due July 3, 2008.
4. Longshore/Daly, Inc. is in the process of gathering documents and payment histories necessary to formulate an answer.
5. Thomas S. Moore is scheduled to be out of town July 1, 2008 through July 11, 2008 and will be unable to review any documents until his return.

WHEREFORE, Longshore/Daly respectfully requests an additional twenty-eight days in which to file its answer.

Respectfully Submitted,

/s/ Thomas S. Moore
One of the Attorneys for
Longshore/Daly, Inc.

Thomas S. Moore
Jane F. Anderson
Anderson & Moore, P.C.
111 W Washington
Suite 1100
Chicago, IL 60602
(312) 251-1500

Certificate of Service

I hereby certify that on March 24, 2008, I electronically filed the Notice of Motion and Motion to Extend Time to Respond on behalf of Longshore/Daly, Inc. with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Patrick N. Ryan
Baum Sigman Auerbach & Neuman
200 W Adams Street, Suite 2200
Chicago, IL 60606

Respectfully Submitted:

/s/ Thomas S. Moore
Anderson & Moore, P.C.
111 West Washington Street
Suite 1100
Chicago, IL 60602